U.S. FISH AND WILDLIFE SERVICE
SPECIES ASSESSMENT AND LISTING PRIORITY ASSIGNMENT FORM

SCIENTIFIC NAME: *Calamagrostis expansa*

COMMON NAME: No common name

LEAD REGION: Region 1

INFORMATION CURRENT AS OF: July 2005

STATUS/ACTION:

___ Species assessment - determined species did not meet the definition of endangered or threatened under the Act and, therefore, was not elevated to Candidate status

___ New candidate

_X__ Continuing candidate

___ Non-petitioned

_X__ Petitioned - Date petition received: May 11, 2004

__ 90-day positive - FR date:

_X_ 12-month warranted but precluded - FR date: May 11, 2005

_N_ Did the petition request a reclassification of a listed species?

FOR PETITIONED CANDIDATE SPECIES:

a. Is listing warranted (if yes, see summary of threats below)? yes

b. To date, has publication of a proposal to list been precluded by other higher priority listing actions? yes

c. If the answer to a. and b. is "yes", provide an explanation of why the action is precluded. We find that the immediate issuance of a proposed rule and timely promulgation of a final rule for this species has been, for the preceding 12 months, and continues to be, precluded by higher priority listing actions. During the past 12 months, most of our national listing budget has been consumed by work on various listing actions to comply with court orders and court-approved settlement agreements, meeting statutory deadlines for petition findings or listing determinations, emergency listing evaluations and determinations and essential litigation-related, administrative, and program management tasks. We will continue to monitor the status of this species as new information becomes available. This review will determine if a change in status is warranted, including the need to make prompt use of emergency listing procedures. For information on listing actions taken over the past 12 months, see the discussion of "Progress on Revising the Lists," in the current CNOR which can be viewed on our Internet website (http://endangered.fws.gov).

___ Listing priority change

Former LP: ___

New LP: ___

Date when the species first became a Candidate (as currently defined): 1999

___ Candidate removal: Former LP: __

___ A – Taxon is more abundant or widespread than previously believed or not subject to the degree of threats sufficient to warrant issuance of a proposed listing or continuance of candidate status.
___U – Taxon not subject to the degree of threats sufficient to warrant issuance of a proposed listing or continuance of candidate status due, in part or totally, to conservation efforts that remove or reduce the threats to the species.
___ F – Range is no longer a U.S. territory.
___ I – Insufficient information exists on biological vulnerability and threats to support listing.
___ M – Taxon mistakenly included in past notice of review.
___ N – Taxon does not meet the Act's definition of "species."
___ X – Taxon believed to be extinct.

ANIMAL/PLANT GROUP AND FAMILY: Flowering plants, Poaceae (Grass family)

HISTORICAL STATES/TERRITORIES/COUNTRIES OF OCCURRENCE: Hawaii, islands of Maui and Hawaii.

CURRENT STATES/ COUNTIES/TERRITORIES/COUNTRIES OF OCCURRENCE: Hawaii, islands of Maui and Hawaii.

LAND OWNERSHIP: *Calamagrostis expansa* occurs on private and State lands.

LEAD REGION CONTACT: Paul Phifer, 503-872-2823, paul_phifer@fws.gov

LEAD FIELD OFFICE CONTACT: Pacific Islands Fish and Wildlife Office, Christa Russell, 808-792-9400, christa_russell@fws.gov

BIOLOGICAL INFORMATION:

Species Description *Calamagrostis expansa* is a robust, short-rhizomatous perennial with erect or decumbent culms, 5 to 20 decimeters (1.6 to 6.6 feet) tall, 4 to 8 millimeters (0.16 to 0.3 inches) in diameter. Sheaths are 3.5 to 4 millimeters (0.14 to 0.16 inches) long and overlap closely along the middle of the culm. Leaf blades are flat to involute, 15 to 20 centimeters (6 to 8 inches) long, 1 to 3 centimeters (0.4 to 1.2 inches) wide, with the uppermost leaf blade reduced and hard-pointed. Inflorescences are paniculate, oblong, 15 to 30 centimeters (6 to 11.8 inches) long, devoid of spikelets on the lower half of the branch. The 1.5 to 2 millimeters (0.06 to 0.08 inches) rachilla is obscured by long, whitish yellow, silky hairs. The fruit is pale brown, ovoid, 2 to 2.5 millimeters (0.08 to 0.1 inches) long, slightly grooved ventrally, with an apiculate apex (O'Connor 1999).

Taxonomy *Calamagrostis expansa* was described by A.S. Hitchcock. This species is recognized as a distinct taxon in O'Connor (1999) and Wagner and Herbst (2003), the most recently accepted Hawaiian plant taxonomy.

Habitat *Calamagrostis expansa* is found in wet forest, open bogs, and bog margins. On Maui, *C. expansa* is found with the associated species *Carex echinata, Cheirodendron trigynum, Deschampsia nubigena, Dicranopteris, Dryopteris* spp., *Leptechophylla tameiameiae, Lysimachia* sp., *Machaerina* sp., *Metrosideros polymorpha, Oreobolus furcatus, Raillardia* sp., *Rhynchospora* sp., *Sadleria* sp., *Vaccinium* sp., and various ferns, and elevations between 1,219 to 2,286 meters (4,000 to 7,500 feet). On the island of Hawaii, *C. expansa* is found in the Kohala Mountains at the northern tip of the island with the associated species *Cheirodendron trigynum, Machaerina angustifolia, Metrosideros polymorpha* var. *incana,* and *Rhynchospora* sp., and elevations between 1,280 to 1,354 meters (4,200 to 4,442 feet) (O'Connor 1999; Hawaii Natural Heritage Program Database 2004).

Historical and Current Range/Current Status Historically rare, *Calamagrostis expansa* was reported from wet forest and bogs on Maui (O'Connor 1999). Discovered on the island of Hawaii in 1995, the historical status of the species on this island is unknown. Currently, this species is known from 100 populations of approximately 400 individuals on Maui and approximately five populations of about 300 individuals on the island of Hawaii. Additional individuals may be found on west Maui with further surveys, but probably not hundreds (Robert Hobdy, Hawaii Division of Forestry and Wildlife, pers. comm. 1996; Arthur C. Medeiros III, U.S.G.S. Biological Resources Discipline, pers. comm. 1996; Steve Perlman and Ken Wood, National Tropical Botanical Garden, pers. comms. 1996; Hawaii Natural Heritage Program Database 2004; Hank Oppenheimer, Maui Land and Pineapple Company, pers. comm. 2005).

THREATS:

A. The present or threatened destruction, modification, or curtailment of its habitat or range. This species is threatened by feral pigs (*Sus scrofa*) that degrade and destroy habitat (R. Hobdy, pers. comm. 1996; A. Medeiros, pers. comm. 1996; S. Perlman and K. Wood, pers. comms. 1996). As early as 1778, European explorers introduced livestock, which became feral, increased in number and range, and caused significant changes to the natural environment of Hawaii. Past and present activities of introduced alien mammals are the primary factor altering and degrading vegetation and habitat. Pigs are currently present on the islands of Maui and Hawaii where *Calamagrostis expansa* occurs, and inhabit rain forests and grasslands. While rooting in the ground in search of the invertebrates and plant material they eat, feral pigs disturb and destroy vegetative cover, trample plants and seedlings, and threaten forest regeneration by damaging seeds and seedlings. They disturb soil and cause erosion, especially on slopes. Alien plant seeds are dispersed on their hooves and coats as well as through their digestive tracts, and the disturbed soil is fertilized by their feces, helping these plants to establish (Cuddihy and Stone 1990; Wagner *et al*. 1999a). Pig exclusion fences protect most of the west Maui populations of this species; however, without continued monitoring and maintenance of those fences, pigs from surrounding areas can easily access fenced areas. In addition, the remaining, unfenced individuals of this taxon on Maui and Hawaii Island are still impacted by this threat.

B. Overutilization for commercial, recreational, scientific, or educational purposes. None known.

C. Disease or predation.
Because Hawaii's native plants evolved without any browsing or grazing mammals present, many lost natural defenses to such impacts (Carlquist 1980, Lamoureux 1994). Browsing by ungulates has been observed on many other native species, including common and rare or endangered species (Cuddihy and Stone 1990; Loope *et al.* 1991). Therefore, even though there have been no observations of browsing for this species, it is likely that pigs impact this species directly as well as their indirect impacts to the surrounding habitat. Pig exclusion fences protect most of the west Maui populations of this species; however, without continued monitoring and maintenance of those fences, pigs from surrounding areas can easily access fenced areas. In addition, the remaining, unfenced individuals of *Calamagrostis expansa* on Maui and Hawaii island are still impacted by this threat.

D. The inadequacy of existing regulatory mechanisms.
Pigs are managed in Hawaii as game animals, but many populate inaccessible areas where hunting is difficult, if not impossible, and therefore has little effect on their numbers. Pig hunting is allowed on all islands either year-round or during certain months, depending on the area (Hawaii Department of Lands and Natural Resources n.d.-a, n.d. b, n.d.-c). However, public hunting does not adequately control the number of ungulates to eliminate this threat to native plant species. Pig exclusion fences protect most of the west Maui populations of this species; however, without continued monitoring and maintenance of those fences, pigs from surrounding areas can easily access fenced areas. In addition, the remaining, unfenced individuals of *Calamagrostis expansa* on Maui and Hawaii island are still impacted by this threat.

E. Other natural or manmade factors affecting its continued existence.
Alien plant species threaten *Calamagrostis expansa* (R. Hobdy, pers. comm. 1996; A. Medeiros, pers. comm. 1996; S. Perlman and K. Wood, pers. comms. 1996). Although the exact pest species that threaten this plant have not been identified, alien pest plants are found throughout the areas where this species occurs. The original native flora of Hawaii consisted of about 1,400 species, nearly 90 percent of which were endemic. Of the total native and naturalized Hawaiian flora of 1,817 taxa, 47 percent were introduced from other parts of the world, and nearly 100 species have become pests (Smith 1985; Wagner *et al*. 1999a). Confirmed personal observations (R. Hobdy, pers. comm. 1996; A. Medeiros, pers. comm. 1996; S. Perlman and K. Wood, pers. comms. 1996) and several studies (Cuddihy and Stone 1990; Wood and Perlman 1997; Robichaux *et al*. 1998) indicate nonnative plant species may outcompete native plants similar to *Calamagrostis expansa*. Competition may be for space, light, water, or nutrients, or there may be a chemical inhibition of other plants (Smith 1985; Cuddihy and Stone 1990). In addition, nonnative pest plants found in habitat similar to that of this species have been shown to make the habitat less suitable for native species (Smathers and Gardner 1978; Smith 1985; Loope and Medeiros 1992; Medeiros *et al.* 1992; Ellshoff *et al.* 1995; Meyer and Florence 1996; Medeiros *et al.* 1997; Loope *et al*. 2004). In particular, alien pest plant species modify habitat by modifying availability of light, altering soil-water regimes, modifying nutrient cycling, or altering fire characteristics of native plant communities (Smith 1985; Cuddihy and Stone 1990; Vitousek *et al*. 1987). Because of demonstrated habitat modification and resource competition by nonnative plant species in habitat similar to the wet forest, open bogs, and bog margin habitat

of *C. expansa*, the Service believes nonnative plant species are a threat to *C. expansa*. Nonnative plants are being controlled in most of the west Maui populations of this species, but will probably never be completely eradicated because new propagules are constantly being dispersed into the fenced area from surrounding, unmanaged lands. Currently, many widespread alien plant taxa cannot be completely eradicated from Maui, and therefore are expected to continue dispersing into previously managed areas (Loope 1998, Smith 1985). The remaining unmanaged populations of *C. expansa* on Maui and the island of Hawaii are still impacted by this threat.

CONSERVATION MEASURES PLANNED OR IMPLEMENTED

The State of Hawaii and private landowners have initiated ungulate control and weed control in some of the areas where this species occurs. Construction of an ungulate exclosure fence in the Kahakuloa Game Management Area on west Maui, funded through a Service grant to the State Division of Forestry and Wildlife, will protect individuals of *Calamagrostis expansa* in this area (Maui Pineapple Company, Ltd. 1999). The fence construction began in August 2004 and is ongoing. In addition, the West Maui Watershed Partnership, a non-governmental, non-profit partnership composed of west Maui landowners and managers, received funding from the Service over the last five years for other ungulate exclosure fences, which have been completed, and ungulate and nonnative plant control, which is ongoing. These actions provide protection to the individuals of *Calamagrostis expansa* in the fenced areas in the west Maui mountains.

The East Maui Watershed Partnership, a non-governmental, non-profit partnership composed of east Maui landowners and managers, received funding from the Service in 2005 to continue fencing a 100,000 acre area to exclude feral ungulates and control nonnative plants (University of Hawaii 2005).

SUMMARY OF THREATS:

The major threats to this taxon are pigs and nonnative plant species, which are believed to be a major cause of the decline of this species throughout its range. Feral pigs have been fenced out of most of the west Maui populations where *Calamagrostis expansa* currently occurs, but the fences must be continually maintained to prevent incursion. Nonnative plants have been reduced in the populations that are fenced. These on-going conservation efforts for this species benefit most of the west Maui populations. The remaining populations of the species on Maui and the island of Hawaii are still impacted by these threats and all populations will require long-term monitoring and management to maintain threat free areas.

LISTING PRIORITY:

THREAT			
Magnitude	Immediacy	Taxonomy	Priority
High	**Imminent**	Monotypic genus	1
		Species	**2***
		Subspecies/population	3
	Non-imminent	Monotypic genus	4

		Species Subspecies/population	5 6
Moderate to Low	Imminent Non-imminent	Monotypic genus Species Subspecies/population Monotypic genus Species Subspecies/population	7 8 9 10 11 12

Rationale for listing priority number

Magnitude:

This species is highly threatened by pigs that degrade and destroy habitat and by nonnative plants that outcompete and displace native plants. Threats to wet forest and bog habitat of *Calamagrostis expansa* occur throughout most of its range, and are expected to continue or increase without their control or eradication. Feral pigs have been fenced out of most of the west Maui populations where *C. expansa* currently occurs. In addition, construction of an ungulate exclosure fence in the Kahakuloa Game Management Area on west Maui is ongoing and will protect individuals of *C. expansa* in this area. Construction of a feral ungulate exclosure fence in east Maui is underway. All fences must be continually maintained to prevent incursion by feral pigs. Nonnative plant control is ongoing in the populations that are fenced. The unmangaged populations are still impacted by these threats. Long-term monitoring and management will be required to maintain threat free areas.

Imminence:

Threats to *Calamagrostis expansa* from pigs and nonnative plants are imminent because they are ongoing in the population on the island of Hawaii and in the unmanaged Maui populations.

Yes Have you promptly reviewed all of the information received regarding the species for the purpose of determining whether emergency listing is needed?

Is Emergency Listing Warranted? No. *Calamagrostis expansa* is currently known from slightly over 100 populations totaling approximately 700 individuals. The species is threatened by habitat destruction and possible predation by feral pigs, and competition with nonnative plants. The species does not appear to be appropriate for emergency listing at this time because the immediacy of the threats is not so great as to imperil a significant proportion of the taxon within the time frame of the routine listing process. In addition, individuals of *Calamagrostis expansa* on Maui will benefit from conservation actions initiated by the State Division of Forestry and Wildlife, private landowners, the West and East Maui Watershed Partnerships, and funded in part by the Service. If it becomes apparent that the routine listing process is not sufficient to prevent large losses that may result in this species' extinction, then the emergency rule process for this species will be initiated. We will continue to monitor the status of *C. expansa* as new information becomes available. This review will determine if a change in status is warranted, including the need to make prompt use of emergency listing procedures.

DESCRIPTION OF MONITORING:
Much of the information in this form is based on the results of a meeting of 20 botanical experts held by the Center for Plant Conservation in December of 1995, and was updated with information from a survey conducted by National Tropical Botanical Garden in late 1995, and by personal communication with Robert Hobdy, Hawaii Division of Forestry and Wildlife in 1996; Art Medeiros, U.S. Geological Survey's Biological Resources Division in 1996; and Steve Perlman and Ken Wood, National Tropical Botanical Garden in 1996. We have incorporated additional information on this species from our files and the most recent supplement to the *Manual of the Flowering Plants of Hawaii* (Wagner and Herbst 2003). In 2004 the Pacific Islands office contacted the following species experts: Bob Hobdy, retired from Hawaii Division of Forestry and Wildlife; Joel Lau of the Hawaii Natural Heritage Program; Art Medeiros of the U.S.G.S. Biological Resources Discipline; Hank Oppenheimer, Maui Land and Pineapple Company; and Steve Perlman and Ken Wood of National Tropical Botanical Garden. No new information on status or range was provided in 2004. In 2005 we contacted the species experts listed below, and confirmation of the status of *Calamagrostis expansa* was provided by Hank Oppenheimer.

The Hawaii Natural Heritage Program identified this species as critically imperiled (Natural Heritage Program Database 2004). Based on the International Union for Conservation of Nature and Natural Resources Red Plant Data Book rarity categories, this species is recognized as Rare (could be considered at risk) by Wagner *et al*. (1999b).

One species expert provided new information confirming the status of the species this year and the results are included in this assessment.

COORDINATION WITH STATES:
In October 2004 we provided the Hawaii Division of Forestry and Wildlife with copies of our most recent candidate assessments for their review and comment. Vickie Caraway, the State botanist, reviewed the information for this species and provided no additional information or corrections (V. Caraway, pers. comm. 2005).

LITERATURE CITED

List all experts contacted:

Name	Date	Place of Employment
1. Joel Lau	June 28, 2005	Hawaii Natural Heritage Program
2. Art Medeiros	June 28, 2005	U.S.G.S. Biological Resources Discipline
3. Jim Jacobi	June 28, 2005	U.S.G.S. Biological Resources Discipline
4. Rick Warshauer	June 28, 2005	U.S.G.S. Biological Resources Discipline
5. Hank Oppenheimer*	June 28, 2005	Maui Land and Pineapple Company
6. Kapua Kawelo	June 28, 2005	U.S. Army
7. Dave Lorence	June 28, 2005	National Tropical Botanical Garden
8. Steve Perlman	June 28, 2005	National Tropical Botanical Garden
9. Ken Wood	June 28, 2005	National Tropical Botanical Garden
10. Marie Bruegmann	July 13, 2005	U.S. Fish and Wildlife Service
11. Vickie Caraway	June 14, 2005	Hawaii Division of Forestry and Wildlife

*Provided new information on this taxon in 2005

List all databases searched:

Name	Date
1. Hawaii Natural Heritage Program	2004

Other resources utilized:

Carlquist, S. 1980. Hawaii: A natural history, 2nd edition. Pacific Tropical Botanical Garden, Honolulu. 468 pp.

Center for Biological Diversity, Dr. Jane Goodall, Dr. E.O. Wilson, Dr. Paul Ehrlich, Dr. John Terborgh, Dr. Niles Eldridge, Dr. Thomas Eisner, Dr. Robert Hass, Barbara Kingsolver, Charles Bowden, Martin Sheen, the Xerces Society, and the Biodiversity Conservation Alliance. 2004. Hawaiian Plants: petitions to list as federally endangered species. May 4, 2004.

Cuddihy, L.W., and C.P. Stone. 1990. Alteration of native Hawaiian vegetation; effects of humans, their activities and introductions. Coop. Natl. Park Resources Stud. Unit, Hawaii. 138 pp.

Ellshoff, Z.E., D.E. Gardner, C. Wikler, and C.W. Smith. 1995. Annotated bibliography of the genus *Psidium*, with emphasis on *P. cattleianum* (strawberry guava) and *P. guajava* (common guava), forest weeds in Hawai`i. Cooperative National Park Resources Studies Unit, University of Hawaii. Technical Report 95.

Hawaii, Department of Land and Natural Resources. N.d.-a. Summary of Title 13, Chapter 123, Game mammal hunting rules, island of Oahu. Division of Forestry and Wildlife, Honolulu. 2 pp.

Hawaii, Department of Land and Natural Resources. N.d.-b. Summary of Title 13, Chapter 123, Game mammal hunting rules, island of Molokai. Division of Forestry and Wildlife, Honolulu. 2 pp.

Hawaii, Department of Land and Natural Resources. N.d.-c. Summary of Title 13, Chapter 123, Game mammal hunting rules, island of Maui. Division of Forestry and Wildlife, Honolulu. 2 pp.

Lamoureux, C.H. 1994. Conserving Hawaiian biodiversity – the role of Hawaiian botanical gardens. Pp. 55-57. In: C.-I Peng and C.H. Chou (eds.). Biodiversity and Terrestrial Ecosystems. Institute of Botany, Academia Sinica Monograph Series No. 14.

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Loope, L.L. and A.C. Medeiros. 1992. A new and invasive grass on Maui. Newsletter of the Hawaiian Botanical Society 31: 7-8.

Loope, L.L. 1998. Hawaii and Pacific Islands. Pp. 747-774. In: M.J. Mac, P.A. Opler, C.E. Puckett Haecker, and P.D. Doran (eds.). Status and Trends of the Nation's Biological Resources, Volume 2. U.S. Department of the Interior, U.S. Geological Survey, Reston, VA.

Loope, L., F. Starr and K. Starr. 2004. Management and research for protecting endangered Hawaiian plant species from displacement by invasive plants on Maui, Hawaii. Weed Technology 18: 1472-1474.

Maui Pineapple Company, Ltd. 1999. Pu`u Kukui Watershed Management Area, Kahalawai, Maui, Hawai`i, Fiscal Year 1999 Progress Report, Biannual Report. Submitted to the State of Hawai`i Department of Land and Natural Resources Natural Area Partnership Program, January, 1999.

Medeiros, A.C., L.L. Loope, P. Conant and S. McElvaney. 1997. Status, ecology, and management of the invasive plant, *Miconia calvescens* DC (Melastomataceae) in the Hawaiian Islands. Bishop Mus. Occas. Pap. 48: 23-36.

Medeiros, A.C., L.L. Loope, T. Flynn, S.J. Anderson, L.W. Cuddihy, and K.A. Wilson. 1992. Notes on the status of an invasive Australian tree fern (*Cyathea cooperi*) in Hawaiian rain forests. American Fern Journal 82: 27-33.

O'Connor, P.J. 1999. Poaceae: *In* Wagner, W.L., D.R. Herbst, and S.H. Sohmer, Manual of the Flowering Plants of Hawai`i. University of Hawaii Press and Bishop Museum Press, Honolulu. Bishop Mus. Spec. Publ. 97: 1481-1604.

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Scott, J.M., S. Mountainspring, F.L. Ramsey, and C.B. Kepler. 1986. Forest bird communities of the Hawaiian Islands: Their dynamics, ecology, and conservation. Studies in Avian Biology 9:1-429. Cooper Ornithological Society, Los Angeles.

Smathers, G.A. and D.E. Gardner. 1978. Stand analysis of an invading firetree (*Myrica faya* Aiton) population, Hawai`i. Proceeding of the Second Conference on Natural Science, Hawaii Volcanoes National Park, pp. 274-288.

Smith, C.W. 1985. Impact of alien plants on Hawai`i's native biota: *In* Stone, C.P., and J.M. Scott (eds.), Hawai`i's Terrestrial Ecosystems: Preservation and Management. Coop.

Natl. Park Resources Stud. Unit, Univ. Hawaii, Honolulu, pp. 180-250.
Tomich, P.Q. 1986. Mammals in Hawai`i: A synopsis and notational bibliography. Bishop Museum Press, Honolulu. 375 pp.
University of Hawaii, Pacific Cooperative Studies Unit. 2005. Threat reduction in the east Maui watershed. Proposal to U.S. Fish and Wildlife Service for 2005 funding.
Vitousek, P.M., C.M. D'Antonio, L.L. Loope, M. Rejnanek, and R. Westerbrooks. 1997. Introduced species: a significant component of human-caused global change. New Zealand Journal of Ecology 21(1): 1-16.
Wagner, W.L., D.R. Herbst, and S.H. Sohmer. 1999a. Manual of the Flowering Plants of Hawai`i. University of Hawaii Press and Bishop Museum Press, Honolulu. Bishop Mus. Spec. Publ. 97: 1-1918.
Wagner, W.L., M.M. Bruegmann, and J.Q.C. Lau. 1999b. Hawaiian vascular plants at risk: 1999. Bishop Mus. Occas. Pap. 60: 1-58.
Wagner, W.L. and D.R. Herbst. 2003. Electronic supplement to the manual of flowering plants of Hawai‘i, version 3.1. December 12, 2003. Available from the Internet. URL: http://rathbun.si.edu/botany/pacificislandbiodiversity/hawaiianflora/supplement.htm.
Wenkam, R. 1969. Kauai and the Park Country of Hawaii. Sierra Club, San Francisco. 160 pp.
Wood, K.R. and S. Perlman. 1997. Maui 14 plant survey final report. Submitted by National Tropical Botanical Garden, October, 1997.

APPROVAL/CONCURRENCE: Lead Regions must obtain written concurrence from all other Regions within the range of the species before recommending changes to the candidate list, including listing priority changes; the Regional Director must approve all such recommendations. The Director must concur on all 12-month petition findings, additions of species to the candidate list, removal of candidate species, and listing priority changes.

Approve: Acting _____ 11/16/05
Regional Director, Fish and Wildlife Service Date

_____

Concur: _____ August 23, 2006
Director, Fish and Wildlife Service Date

Do not concur: _____ _____
Director, Fish and Wildlife Service Date

Date of annual review: September 19, 2005
Conducted by: Marie M. Bruegmann, Pacific Islands FWO
Plant Recovery Coordinator

Comments:
PIFWO Review

Reviewed by: Christa Russell Date: September 20, 2005
Plant Conservation Program Leader

Gina Shultz Date: October 17, 2005
Assistant Field Supervisor,
Endangered Species

Patrick Leonard Date: October 17, 2005
Field Supervisor